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Nautical Department AP Moller 50 Esplanaden DK-1098 Copenhagen K Denmark

February 28, 2005

In regards to: USCG-2005-20380 - 5

Docket Management Facility US Department of Transportation 400 Seventh Street SW Washington, DC 20590-0001

To Whom It May Concern:

I reference to docket number USCG-2005-20380, AP Moller would like to submit the following comments.

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Question 3: What are the benefits and drawbacks to modifying existing vessel routing measure or establishing new routing measures such as those described in the NMFS ANPRM?

Response A: If new routing measures were to be established and made mandatory, there would be no negative impact on vessel schedules. If they were made voluntary, it is possible our competitors could have an advantage if they chose not to volunteer.

Response B: There are times when weather conditions determine a vessel's speed, course, and heading. Mandatory routing measures would have to take into account these situations so as not to impact the crew, vessel, or cargo.

Regards,

Mouth